

**UNITED STATES BANKRUPTCY COURT
Middle DISTRICT OF Pennsylvania
Wilkes-Barre DIVISION**

In re:) CASE NO. 5:19-bk-01904-RNO
Peter Nicholas DeConzo,) JUDGE Robert N. Opel II
Donna C DeConzo)
aka Dominica DeConzo,)
Debtors.)
)

**WELLS FARGO BANK, NATIONAL ASSOCIATION, AS TRUSTEE FOR
LEHMAN MORTGAGE TRUST MORTGAGE PASS-THROUGH CERTIFICATES,
SERIES 2006-9'S NOTICE OF DEBTOR'S REQUEST FOR FORBEARANCE DUE TO
THE COVID-19 PANDEMIC**

Now comes Creditor WELLS FARGO BANK, NATIONAL ASSOCIATION, AS TRUSTEE FOR LEHMAN MORTGAGE TRUST MORTGAGE PASS-THROUGH CERTIFICATES, SERIES 2006-9 ("Creditor"), by and through undersigned counsel, and hereby submits Notice to the Court of the Debtor's request for mortgage payment forbearance based upon a material financial hardship caused by the COVID-19 pandemic.

The Debtor recently contacted Creditor requesting a forbearance period of 6 months and has elected to not tender mortgage payments to Creditor that would come due on the mortgage starting 04/01/2020 through 09/01/2020. Creditor holds a secured interest in real property commonly known as 85 WINONA RD., MOUNT POCONO, Pennsylvania 18344; as evidenced by claim number 12-1 on the Court's claim register. Creditor, at this time, does not waive any rights to collect the payments that come due during the forbearance period. If the Debtor desires to modify the length of the forbearance period or make arrangements to care for the forbearance

period arrears, Creditor asks that the Debtor or Counsel for the Debtor make those requests through undersigned counsel.

Per the request, Debtor will resume Mortgage payments beginning 10/01/2020 and will be required to cure the delinquency created by the forbearance period (hereinafter “forbearance arrears”). Creditor has retained undersigned counsel to seek an agreement with Debtor regarding the cure of the forbearance arrears and submit that agreement to the Court for approval. If Debtor fails to make arrangements to fully cure the forbearance arrears, Creditor reserves its rights to seek relief from the automatic stay upon expiration of the forbearance period.

Robertson, Anschutz, Schneid & Crane LLC
Authorized Agent for Secured Creditor
10700 Abbott's Bridge Road, Suite 170
Duluth, GA 30097
Telephone: (470) 321-7112

By: /s/ Charles G. Wohlrab
Charles G. Wohlrab, Esquire
Email: cwohlrab@rascrane.com

CERTIFICATE OF SERVICE

I certify that I caused a true and accurate copy of the foregoing *Notice of Debtor's Request for Forbearance* to be served upon the following parties in the following fashion on this 22nd day of May 2020:

Peter Nicholas DeConzo
85 Winona Rd
Mount Pocono, PA 18344

Donna C Deconzo
85 Winona Rd
Mount Pocono, PA 18344

And via electronic mail to:

Ronald V. Santora
Bresset and Santora
1188 Wyoming Avenue
Forty Fort, PA 18704

Charles J DeHart, III (Trustee)
8125 Adams Drive, Suite A
Hummelstown, PA 17036

United States Trustee
228 Walnut Street, Suite 1190
Harrisburg, PA 17101

Robertson, Anschutz, Schneid & Crane LLC
Authorized Agent for Secured Creditor
10700 Abbott's Bridge Road, Suite 170
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Telephone: (470) 321-7112

By: /s/ Charles G. Wohlrab
Charles G. Wohlrab, Esquire
Email: cwohlrab@rascrane.com